	Case 3:20-cr-00249-RS	Document 813-5	Filed 12/24/25	Page 1 of 10
1 2 3 4 5 6 7 8	John M. Pierce (Bar No. 250 jpierce@johnpiercelaw.com JOHN PIERCE LAW P.C 21550 Oxnard Street, 3rd Fl Woodland Hills, CA 91367 Tel. (321) 961-1848 Attorneys for Defendant ROWLAND MARCUS AN	oor DRADE UNITED STATES C FOR THE NII	NTH CIRCUIT Case Nos. 25-509:	5; 25-6056; 25-6507
9	Plaintiff-Appellee,	,	D.C. No. 3:20-cr-(Northern District of San Francisco	
11	v. ROWLAND MARCUS AN	DRADE,		RELIEF PENDING
12 13 14	Defendant-Appellant.		RULING ON AP MOTION FOR M (DKT. 33)	
15		<u>EXHI</u>	BIT-E	
16 17 18 19 20 21 22 23 24 25 26 27 28				NDRADE tend Surrender Date.
		-	1 -	

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNA

UNITED STATES OF AMERICA,

CASE No. 3:20-cr-00249-RS-1

Plaintiff

v.

ROWLAND MARCUS ANDRADE,

Defendant

DECLARATION OF ROWLAND MARCUS ANDRADE IN SUPPORT OF MOTION OF ADMINISTRATIVE RELIEF TO EXTEND SURRENDER DATE AND NINTH CIRCUIT UPDATE

Judge: Hon. Richard Seeborg

EXHIBIT - C

DECLARATION OF ROWLAND MARCUS ANDRADE

1	Casse 3 220 or 10002449 FRS	Documentt80853	FFileed 1122/2146/2255	Page 2 off 190
1	John M. Pierce (Bar No. 250			
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3	21550 Oxnard Street, 3rd Fl Woodland Hills, CA 91367	oor		
4	Tel. (321) 961-1848			
5	Attorneys for Defendant ROWLAND MARCUS AN	DRADE		
6				
7				
8	IN '	THE UNITED STAT	ES DISTRICT COU	JRT
9	FOR T	HE NORTHERN DIS	STRICT OF CALIF	ORNIA
10				
11	UNITED STATES OF AMI	ERICA,	Case No. 3:20-C	R-00249-RS
12	Plaintiff,			N OF ROWLAND
13	v.		ADMINISTRA	PRADE IN SUPPORT OF TIVE RELIEF TO
14	ROWLAND MARCUS AN	DRADE,		F-SURRENDER DATE
15	Defendan	ıt.	Judge: Hon.	Richard Seeborg
16				
17				
18	DECLARATION	OF ROWLAND MA	RCUS ANDRADE	IN SUPPORT OF
19	ADMINISTRATIVE	RELIEF TO EXTEN	D SELF-SURRENI	DER DATE MOTION
20	This declaration in a		all the foots and four	h in the massions declaration
21		-		th in the previous declaration
22	as set forth in docket numbe	r 788-2. I Rowland M	Iarcus Andrade decl	are as follows:
23	1. The left ankle sur	rgery is a Dwyer oste	otomy with anterior	capsulotomy and
24	osteophyte excisi	ion to correct a high-a	rched (cavovarus) f	oot deformity and address
25	associated structu	ıral problems.		
26	2. On October 8, m	y A1C level was abov	ve the threshold at 8	.7. When I was retested on
27	,			
28		- 1	-	
	DEFENDANT MARCUS ANDR ADMINISTRATIVE RELIEF TO DATE AND 9TH CIRCUIT UPD	EXTEND SURRENDER	3	CASE NO. 3:20-CR-00249-RS

November 6, 2023, I had reduced my A1C to 7.5.I was informed that I needed to reduce my A1C level to below 7, which was hard, but I was able to accomplish it just before Thanksgiving. I got to a 6.9. I was also notified that I may have Angina Pectoris, which I learned is related to my heart not receiving enough oxygen. The doctors confirmed this through "Chart Review." The VA referred me to a specialist in Houston, Texas, where I underwent a 2D echocardiogram — essentially a sonogram of the heart. I have not yet received the test results which is needed in order to find out what the underlying issue is.

- 3. On December 10, I met with my surgeon and was informed that my surgery date is set for January 26, 2026. The doctors can still proceed with the surgery despite the Angina Pectoris issue, but they will need to take certain precautions, such as potentially using a nerve block. I have an appointment on December 30, 2025 to review the precautions in detail. I was also informed that I will be in a cast for six weeks following the surgery.
- 4. I made vigorous efforts to schedule my left-ankle surgery in November and December but was unable to do so. The doctors allowed me to take multiple A1C tests within a 45-day period to bring my A1C level down, which was necessary to schedule my surgery. While A1C tests are typically conducted every 90 to 120 days, the doctors made an exception due to the urgency of my situation, ensuring that my blood sugar levels were adequately controlled so I could move forward with scheduling my surgery. I attempted to schedule my surgery for this month but was unable to, as the orthopedic surgeons at the Veterans Administration (VA) only operate on Wednesdays

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due to their commitments at other hospitals, and their schedule was fully booked until

5. I will help my appellate counsel understand the case before my surrender date, given

the size of the matter, the nearly 800 docket entries, and the substantial amount of

evidence in the record which includes data that was way too big to efile so it had to be

interest and that I need to get the counsel up to date quickly so that he can also file my

shipped to the Court. I can be able to assist the counsel since doing so is in my best

appeal on the denial of the motion for me to remain on bond and so that he can

properly understand all aspects of the case in order for counsel to be effective.

6. If I were to flee — which I will not — my family and I will lose our interest in all of

Not only financially, but my two young daughters, ages 6 and 10, would endure

significant emotional strain and would be further traumatized by this. I am deeply

committed to my family and would never take any action that would endanger their

7. I hold an ownership interest in my home, jointly with my wife, as well as joint-stock

in biometric-based and digital wallet-based, patent-protected intellectual property that

I developed in 2015. These assets have a potential joint value in the tens of millions, if

not hundreds of millions, of dollars. A portion of these assets is individually sufficient

to satisfy the full amount of the forfeiture judgment. The government is aware of this,

and the attached damages report, prepared by an experienced industry expert who

regularly testifies in patent litigation, confirms that one company alone owes the

our assets. Such an action would have devastating consequences for my family and I.

January 26, 2026.

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DEFENDANT MARCUS ANDRADE'S MOTION FOR

ADMINISTRATIVE RELIEF TO EXTEND SURRENDER

DATE AND 9TH CIRCUIT UPDATE.

mental state or their well-being.

- 3 -

patent company between \$2.7 million (on the low end) and \$40.8 million (on the high end) per year. And this is just one company. See Attachment 1 to this declaration. Aside from their international money laundering activities conducted behind my back, these patents were exactly what Abramoff and his associates were after. The government is aware of this, as well as the value of the technology, as evidenced in the record (NDCA Case No. 20-cr-000249 at Dkt. 777, p. 8:1-3, p. 9, footnote 1, and p. 10:14-18; 9th Cir. No. 25-5095 at Dkt. 27-2, p. 14 of 37).

- 8. I have fully complied with all conditions of my bond and release, have appeared at every hearing, and have remained in regular communication with Probation and counsel. I pose no flight risk or danger to the community. If the Court deems it appropriate, I consent to release conditions, including home detention or GPS monitoring, during any period of extension.
- 9. My wife is currently studying for an exam that will allow her to obtain employment in February or early March of 2026 so she can help provide financial support for herself and our daughters. Although my surgeries will prevent me from walking, I will still be able to assist by caring for the children while she continues studying and begins working until my surrender date.

I declare under penalty of perjury under the laws of the United States that the forefoing is true and correct. Executed on December 16, 2025.

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DEFENDANT MARCUS ANDRADE'S MOTION FOR 28

- 4 -

/s/ Marcus Andrade

/s/ Rowland Marcus Andrade

CASE NO. 3:20-CR-00249-RS

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNA

UNITED STATES OF AMERICA,

CASE No. 3:20-cr-00249-RS-1

Plaintiff

v.

ROWLAND MARCUS ANDRADE,

Defendant

DECLARATION OF ROWLAND MARCUS ANDRADE IN SUPPORT OF MOTION OF ADMINISTRATIVE RELIEF TO EXTEND SURRENDER DATE AND NINTH CIRCUIT UPDATE

Judge: Hon. Richard Seeborg

EXHIBIT - 1 PATENT RELATED ASSETS

(In Support of Declaration of Marcus Andrade, ¶ 7)

Preliminary Assessment:

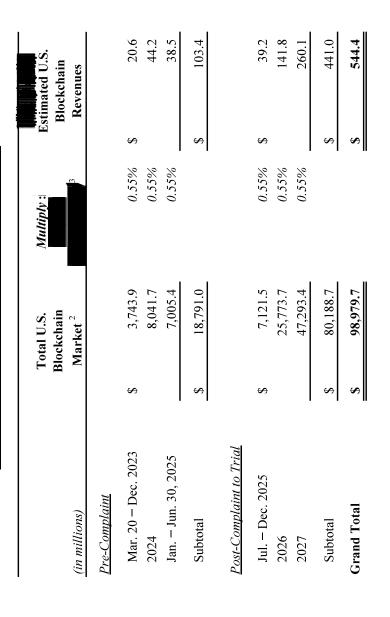
Schedule 1.0

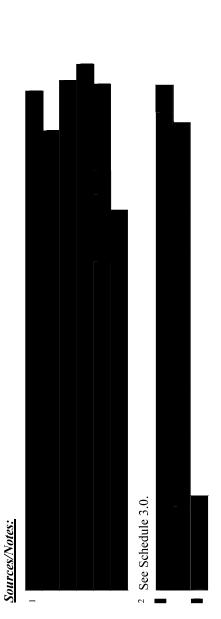
Preliminary Estimate

For the Period March 20, 2023 through December 31, 2027 $^{\mathrm{1}}$

(in millions)	Estin Blo Re	Estimated U.S. Blockchain Revenues ²	% Utilizing Total Potentially Patented Accused Features 3 Revenues 4	Total F Ac Revo	tal Potentially Accused Revenues	1% Royalty	1	5% Royalty	1	10% Royalty	alty
Low Scenario	↔	544.4	\$ %0\$	\$	272.2	\$	2.7 \$		13.6 \$		27.2
High Scenario	⊗	544.4	75% \$	∽	408.3	8	4.1		20.4 \$		40.8
Sources/Notes:											
									_		_1
											ı
z See Schedule 2.0.											







Summary of U.S. Blockchain Market, by Application Type $^{\rm I}$

									Ğ	Governance,		Total U.S.
						Smart				Risk, &		Blockchain
(in millions)	Pa	Payments	\neg	Exchanges	$^{\circ}$	Contracts	Documentation	Digital Identity	Ö	Compliance	Other	Market
	S	2,283	\$	473	S	420	\$ 639	\$ 236	S	444 \$	267 \$	4,761
		3,912		797		701	1,091	389		738	414	8,042
		6,973		1,394		1,218	1,938	999		1,275	663	14,127
		12,903		2,534		2,197	3,574	1,184		2,286	1,094	25,774
		24,009		4,633		3,986	6,630	2,118		4,123	1,795	47,293
		45,040		8,541		7,289	12,400	3,815		7,496	2,926	87,507

Sources/Notes: